

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
CES Environmental Services, Inc. - Removal Polrep  
Initial Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region VI

**Subject:** POLREP #1  
Initial  
CES Environmental Services, Inc.  
  
Houston, TX  
Latitude: 29.6984000 Longitude: -95.3435000

**To:** Ronald D. Crossland, USEPA Superfund Division - PRB  
Anthony Buck, TCEQ  
Reggie Cheatham, USEPA Headquarters

**From:** Gary Moore, FOSC

**Date:** 9/9/2014

**Reporting Period:**

1. Introduction

1.1 Background

<b>Site Number:</b>	A6JP	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	8/26/2014
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Time-Critical
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	9/3/2014	<b>Start Date:</b>	9/3/2014
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	TXD008950461	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

1.1.1 Incident Category

Time Critical

1.1.2 Site Description

This Site is a former chemical recycling facility that filed for bankruptcy in 2010. The Site is under the control of a Trustee for the Estate appointed by the Bankruptcy Court. The Estate does not have the funding necessary to address the conditions at the site. The site consists of approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 20 Aboveground Storage Tanks (ASTs), 15 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. In

addition, spillage of chemicals to exterior surfaces as well as building interiors. The Site has experienced significant vandalism since its bankruptcy in 2010. Additionally, recent spills have occurred due to vandalism which has resulted in the spillage of chemicals and waste to the ground surface and into an adjacent residential neighborhood. Emergency responses to these spills have involved the Estate, City of Houston, Texas Commission on Environmental Quality, and the EPA. These spill responses were addressed by the Estate, Texas Commission on Environmental Quality (TCEQ), and the EPA. .

#### **1.1.2.1 Location**

4904 Griggs Road  
Houston, Harris County, Texas 77021  
Latitude: 29.6984  
Longitude: -95.3435

#### **1.1.2.2 Description of Threat**

The Site is bordered by residential properties and a charter school. Releases of chemicals from the site have been documented into residential areas south of the site as a result of previous spills. These spills have been cleaned up but residual contamination remains which will need to be further investigated. Additionally, the area is saturated with phenolic odors believed to be associated with several of the vacuum boxes and historic releases from these containers.

The primary threats associated with the site is the potential exposure to the surrounding populations from releases from the containers located on the site. Additionally, stormwater could carry materials spilled or materials already spilled off-site impacting both the residential populations and the environment.

#### **1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results**

The site is abandoned and has been significantly vandalized since 2010. Roll-off boxes and Tank Trailers have been stolen from the site and chemicals have been deposited in other on-site containers, secondary containment of aboveground storage tanks, and on the ground surfaces. Additionally, containers have deteriorated and continue to deteriorate and have leaked chemicals to the ground surfaces. The site has approximately 11 vacuum boxes, 2 roll-off boxes, 12 frac tanks, 2 Tanker Trailers, 20 Aboveground Storage Tanks (ASTs), 15 Waste Water Treatment Tanks, Waste Piles, and numerous totes, vats, drums, and smaller containers. The site currently floods during rainfall events as on-site storm drains have been plugged. Stormwater from a portion of the site drained into the neighborhood to the south through early August 2014 at which time the City of Houston and the TCEQ blocked drainage (diking) from continuing to drain into the above and below ground drainage system in the neighborhood. Stormwater continues to drain off-site into the storm drain at the northwest side of the facility heavy rains cause the pooled area to reach capacity.

## **2. Current Activities**

### **2.1 Operations Section**

#### **2.1.1 Narrative**

#### **2.1.2 Response Actions to Date**

The EPA has mobilized its ERRS and START Contractors to begin to address the issues associated with the Site. The EPA Team is in the process of conducting site setup activities. Additionally, container sampling and laboratory and field chemistry is being conducted to determine potential bulking and disposal options. Also, the EPA is working with the City of Houston on the potential for discharge of potentially contaminated stormwaters into the sanitary sewer to be treated at the City's Sewer Treatment Plant. As analytical results are received, disposal options will be determined and disposal of containerized waste will begin.

#### **2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)**

The EPA and TCEQ are currently reviewing facility documents to identify PRPs. If liable and viable PRPs are identified, the EPA will begin negotiations for a potential takeover of the current response actions.

#### 2.1.4 Progress Metrics

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

### 2.2 Planning Section

#### 2.2.1 Anticipated Activities

##### 2.2.1.1 Planned Response Activities

The response activities will involve the disposal of the following containers:

1. Vacuum/Roll-Off Boxes;
2. Management of Stormwaters and Address Building Drainage;
2. Frac Tank Wastes;
3. Totes, Drums, and Smaller Containers;
4. Aboveground Storage Tanks;
5. Contaminated Soils, Asphalt, and Concrete;

##### 2.2.1.2 Next Steps

The EPA Team is currently taking the following activities:

1. Sampling of the various containers above to determine disposal options for wastes;
2. Conducting emergency actions to prepare site for storm events in order to reduce the likelihood of off-site drainage into the residential neighborhood;
3. Procuring and setting up on-site offices;
4. Complete procurements and set up off-site disposal.

#### 2.2.2 Issues

### 2.3 Logistics Section

No information available at this time.

### 2.4 Finance Section

#### Estimated Costs \*

	<b>Budgeted</b>	<b>Total To Date</b>	<b>Remaining</b>	<b>% Remaining</b>
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$1,850,000.00	\$0.00	\$1,850,000.00	100.00%
START	\$150,000.00	\$0.00	\$150,000.00	100.00%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	<b>\$2,000,000.00</b>	<b>\$0.00</b>	<b>\$2,000,000.00</b>	<b>100.00%</b>

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## **2.5 Other Command Staff**

No information available at this time.

## **3. Participating Entities**

### **3.1 Unified Command**

### **3.2 Cooperating Agencies**

City of Houston

Texas Commission on Environmental Quality

## **4. Personnel On Site**

No information available at this time.

## **5. Definition of Terms**

No information available at this time.

## **6. Additional sources of information**

No information available at this time.

## **7. Situational Reference Materials**

No information available at this time.